

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LTD.,

Plaintiff,

vs.

AMAZON.COM, INC.,

Defendant.

Civil Action No. 6:21-cv-00991-ADA

JURY TRIAL DEMANDED

DECLARATION OF LARA A. ROGERS

I, Lara A. Rogers, declare and state as follows:

1. I am Senior Corporate Counsel at Amazon.com, Inc. (“Amazon”). I provide this declaration on behalf of Amazon in support of Defendants’ Opposed Motion to Stay Pending Final Resolution of Plaintiff’s Manufacturer Lawsuits. I am over the age of eighteen and competent to testify. I make this declaration based on personal knowledge.

2. I understand that Plaintiff Sonrai Memory Ltd. (“Sonrai”) alleges infringement of U.S. Patent No. 6,724,241 (“the ’241 patents”) by the following products with SanDisk/Toshiba 64L 3D NAND manufactured by Kioxia Corporation (“Kioxia”) (formerly Toshiba Memory Corporation) and Samsung NAND flash chips (collectively, “Accused Chips”): the LG V50 ThinQ, the Google Pixel 4XL, the Samsung Galaxy S10, and the Samsung Galaxy S21 5G.

3. Amazon is seeking indemnification related to the allegations of infringement as to the ’241 patent.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on December 19th, 2021, in Seattle, Washington.



Lara A. Rogers